



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MSA/SDD
F.#2011R783

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 29, 2011

Via FedEx and ECF

Nancy Lee Ennis, Esq.
Quitano & Ennis
381 Park Avenue South
Suite 701
New York, NY 10016

Re: United States v. Agron Hasbajrami,
Criminal Docket No. 11-623 (JG)

Dear Ms. Ennis:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter another copy set of the discovery turned over to you today in court in the above-referenced matter. Please also consider this letter to be the government's request for reciprocal discovery.

1. Statements of the Defendants

Enclosed please find copies of:

FBI Property Receipt, Bates-numbered 0001;

Advice of Rights forms, Bates-numbered 0002 to 0004;

Consent to Search form, Bates-numbered 0005;

Speedy Arraignment waiver forms, Bates-numbered 0006 to 0014;

USMS Form 129/312 arrest processing information,
Bates-numbered 0015 to 0022;

USMS intake photos, Bates-numbered 0023 to 0025; and fingerprint cards, Bates-numbered 0026 to 0027.

2. Prior Criminal History

Enclosed please find a copy of the defendant's criminal history report, Bates-numbered 0028 to 0033.

3. Documents and Tangible Objects

Enclosed please find a copy of the defendant's Albanian passport, Bates-numbered 0034 to 0040. The government is in possession of a number of items seized from the defendant pursuant to court authorized searches, including a computer. The government will provide a list of these items to you shortly. You may make arrangements with us to schedule a mutually convenient time to inspect these items, including the defendant's computer.

4. Expert Witnesses

The government will comply with Fed. R. Crim. P. 16(a)(1)(G) by notifying you in a timely fashion of any expert the government intends to call at trial and by providing you with the expert's credentials and a summary of the expert's opinion.

6. Brady Materials

The government is aware of and will comply with its obligation to produce exculpatory material or information under Brady v. Maryland, 373 U.S. 83 (1963).

The government will furnish the defense before trial with information or material regarding payments, promises of immunity, leniency, or preferential treatment, if any, made to prospective witnesses within the scope of Giglio v. United States, 405 U.S. 150 (1972) and Napue v. Illinois, 360 U.S. 264 (1959). The government will furnish before trial information or material regarding any prior convictions of any co-conspirator, accomplice or informant who may testify at trial for the government.

The government will also furnish before trial materials discoverable pursuant to Title 18, United States Code, Section 3500.

